

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

In re:

KARIN ELISABETH CAMPBELL-LUNSMANN,

CHAPTER 7

Debtor.

CASE NO. 09-14780-SSM

AMERICA'S SERVICING COMPANY,
AS SERVICER FOR US BANK
NATIONAL ASSOCIATION, AS
TRUSTEE FOR STRUCTURED ASSET
SECURITIES CORPORATION TRUST
2007-EQ1,

Plaintiff.

vs.

KARIN ELISABETH CAMPBELL-LUNSMANN
AKA KARIN E. CAMPBELL-LUNSMANN
DONALD F. KING, TRUSTEE,

Defendants.

MOTION FOR RELIEF

NOTICE

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WISH THE COURT TO GRANT THE RELIEF SOUGHT IN THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN WITHIN FIFTEEN (15) DAYS FROM THE DATE OF SERVICE OF THIS MOTION, YOU MUST FILE A WRITTEN RESPONSE EXPLAINING YOUR POSITION WITH THE COURT AND SERVE A COPY ON THE MOVANT. UNLESS A WRITTEN RESPONSE IS FILED AND SERVED WITHIN THIS FIFTEEN (15) DAY PERIOD, THE COURT MAY DEEM OPPOSITION WAIVED, TREAT THE MOTION AS CONCEDED, AND ISSUE AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT FURTHER NOTICE OR HEARING.

IF YOU MAIL YOUR RESPONSE TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE EXPIRATION OF THE FIFTEEN (15) DAY PERIOD.

**ATTEND THE PRELIMINARY HEARING SCHEDULED TO BE HELD ON
AUGUST 5, 2009 AT 9:30 AM IN THE U.S. BANKRUPTCY COURT,
ALEXANDRIA DIVISION, 200 SOUTH WASHINGTON STREET,
ALEXANDRIA, VA – COURTROOM # 1, 2ND FLOOR.**

NOTICE FROM SAMUEL I. WHITE, P.C.

PURSUANT TO THE FEDERAL FAIR DEBT COLLECTION PRACTICES ACT, WE ADVISE YOU THAT SAMUEL I. WHITE, P.C., COUNSEL FOR THE PLAINTIFF, IS A DEBT COLLECTOR, ATTEMPTING TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION WE OBTAIN FROM YOU WILL BE USED FOR THAT PURPOSE.

MOTION FOR RELIEF

The Motion of America's Servicing Company, as servicer for US Bank National Association, as Trustee for Structured Asset Securities Corporation Trust 2007-EQ1, by Counsel, hereby moves the Court for relief from the automatic stay and in support thereof represents unto the Court:

1. This Court has Jurisdiction over this proceeding pursuant to 28 U. S. C. Sections 157 and 1334 and 11 U. S. C. 362 (d), and that this matter is a core proceeding.

2. The Debtor filed a Petition under Chapter 7 of the Bankruptcy Code on June 15, 2009.

3. The Debtor is the owner of the real property located at 14379 Surrydale Drive, Woodbridge, VA 22193, which property is described as:

Lot 88, Section 9-J, DALE CITY, as the same appears duly dedicated, platted and recorded in Deed Book 983 at Page 713, among the land records of Prince William County, Virginia.

4. Plaintiff is the holder and/or servicer of a certain Deed of Trust Note dated December 7, 2006, which Note is secured by a Deed of Trust of even date therewith and duly recorded.

5. The account is in arrears for 10 monthly mortgage installments. The approximate reinstatement amount through July, 2009 is \$27,175.52, calculated as follows:

7 monthly payments (09/01/08-03/01/09) @ \$2,281.16/month	\$15,968.12
4 monthly payments (04/01/09-07/01/09) @ \$2,243.70/month	\$8,974.80
Accrued late charges	567.60
Property Inspection fees	105.00
BPO fees	95.00
Foreclosure fees and costs	665.00
Bankruptcy fees and costs - Motion for Relief	800.00
Total	\$27,175.52

6. The unpaid principal balance due on said note is \$298,743.68, and the present approximate payoff balance is \$321,800.00.

7. It is the opinion of the Plaintiff that the Debtor is financially unable to maintain said obligation and that Plaintiff will suffer irreparable injury, loss and damage if it is not permitted to foreclose upon its security interest; otherwise Plaintiff is without adequate protection.

WHEREFORE, Plaintiff prays that it be granted relief from the provisions of the automatic stay with regard to the said real property in order to pursue its rights pursuant to the terms of the Note and Deed of Trust, to include the institution of foreclosure proceedings, and further requests that the ten (10) day stay be waived incident to any Order entered incident to the Motion for Relief herein.

AMERICA'S SERVICING COMPANY, AS
SERVICER FOR US BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR STRUCTURED
ASSET SECURITIES CORPORATION TRUST 2007-
EQ1

By: **/s/ ERIC DAVID WHITE**

Of Counsel

Samuel I. White, P. C.

Eric David White, Esquire, VSBN 21346

Randa S. Azzam, Esquire, VSBN 31539

D. Carol Sasser, Esquire, VSBN 28422

1804 Staples Mill Road, Suite 200

Richmond, VA 23230

CERTIFICATE

I hereby certify that a true copy of the foregoing Motion and Notice of Hearing was served by regular mail or email this 6th day of July, 2009, on all necessary parties including Donald F. King, Esquire, Trustee, 9302 Lee Highway, Suite #1100, Fairfax, VA 22030; Martin C Conway, Esquire, Counsel for Debtor, 7926 Jones Branch Drive, Suite 930, McLean, VA 22102; and Karin Elisabeth Campbell-Lunsmann, Debtor, 14379 Surrydale Drive, Dale City, VA 22193.

/s/ ERIC DAVID WHITE

Samuel I. White, P. C.